

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA

CITY OF CHARLOTTESVILLE; CHAMPION
BREWING CO., LLC; ESCAFÉ; MAS TAPAS;
MAYA RESTAURANT; QUALITY PIE;
RAPTURE RESTAURANT AND NIGHT
CLUB; ALAKAZAM TOYS AND GIFTS;
ALIGHT FUND LLC; ANGELO JEWELRY;
HAYS + EWING DESIGN STUDIO, PC;
WOLF ACKERMAN DESIGN, LLC;
WILLIAMS PENTAGRAM CORPORATION;
BELMONT-CARLTON NEIGHBORHOOD
ASSOCIATION; LITTLE HIGH
NEIGHBORHOOD ASSOCIATION; and
WOOLEN MILLS NEIGHBORHOOD
ASSOCIATION,

Plaintiffs,

v.

PENNSYLVANIA LIGHT FOOT MILITIA,
NEW YORK LIGHT FOOT MILITIA,
VIRGINIA MINUTEMEN MILITIA,
AMERICAN FREEDOM KEEPERS, LLC,
AMERICAN WARRIOR REVOLUTION,
REDNECK REVOLT, SOCIALIST RIFLE
ASSOCIATION, TRADITIONALIST
WORKER PARTY, VANGUARD
AMERICA, LEAGUE OF THE SOUTH, INC.,
NATIONAL SOCIALIST MOVEMENT,
JASON KESSLER, ELLIOTT KLINE,
CHRISTIAN YINGLING, GEORGE
CURBELO, FRANCIS MARION, ACE
BAKER, MATTHEW HEIMBACH,
CESAR HESS, SPENCER BORUM,
MICHAEL TUBBS, and JEFF SCHOEP,

Defendants.

Case No. 3:17-CV-00078
Judge Glen E. Conrad

MOTION FOR PRO HAC VICE ADMISSION OF ROBERT FRIEDMAN

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the Western District of Virginia, I, Kyle McNew, an attorney admitted to practice in this Court, and counsel of record in the instant proceeding, hereby move the Court for the admission of Robert Friedman to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Mr. Friedman is an attorney with the Institute for Constitutional Advocacy and Protection at the Georgetown University Law Center, 600 New Jersey Ave. NW, Washington, DC 20001, telephone number (202) 662-9042, Email: rdf34@georgetown.edu.

2. Mr. Friedman is qualified and licensed to practice law and is a member in good standing of the Bar of the State of New York (Registration No. 5240296, admitted July 14, 2014) and the Bar of the District of Columbia (Registration No. 1046738, admitted May 5, 2017).

3. Mr. Friedman agrees to submit to and comply with the appropriate rules of procedure as required in the case for which he is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Robert Friedman to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: November 10, 2017

Respectfully Submitted,

/s/ Kyle McNew
E. Kyle McNew, Esq. (VSB #73210)
R. Lee Livingston, Esq. (VSB #35747)

MICHIEHAMLETT PLLC
500 Court Square, Suite 300
PO Box 298
Charlottesville, VA 22902
(434) 951-7200
LLivingston@michiehamlett.com
kmcnew@michiehamlett.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2017, I electronically filed the foregoing Motion for Pro Hac Vice Admission of Robert Friedman with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all counsel of record, including the following:

Elmer Woodard (VSB 27734)
5661 US Hwy 29
Blairs, VA 24527
(434) 878-3422
isuecrooks@comcast.net

/s/ Kyle McNew

E. Kyle McNew, Esq. (VSB #73210)
R. Lee Livingston, Esq. (VSB #35747)
MICHIEHAMLETT PLLC
500 Court Square, Suite 300
PO Box 298
Charlottesville, VA 22902
(434) 951-7200
LLivingston@michiehamlett.com
kmcnew@michiehamlett.com

Counsel for Plaintiffs